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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE IN
SUPPORT OF DEFENDANT OTTO
TRUCKING'S MOTION TO FILE UNDER
SEAL CERTAIN PORTIONS OF ITS
MOTION IN LIMINE TO EXCLUDE
TESTIMONY OF DR. HESSELINK
REGARDING PROTECTIONS OF
WAYMO'S ALLEGED TRADE SECRETS**

Courtroom: 8 (19th Floor)

Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Trial: October 10, 2017

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion in Limine to Exclude Testimony of Dr. Hesselink Regarding Protections of Waymo’s Alleged Trade Secrets (the “Hesselink Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Hesselink Motion	Highlighted Portions
Exhibit 1 to Vu Declaration	Entire Document
Exhibit 2 to Vu Declaration	Entire Document
Exhibit 3 to Vu Declaration	Entire Document
Exhibit 4 to Vu Declaration	Entire Document
Exhibit 5 to Vu Declaration	Highlighted Portions
Exhibit 6 to Vu Declaration	Entire Document
Exhibit 7 to Vu Declaration	Entire Document

3. The highlighted portions of the Hesselink Motion, the highlighted portions of Exhibit 5 to the Vu Declaration, and the entirety of Exhibits 1, 2, 3, 4, 6 and 7 to the Vu Declaration contain information that Waymo has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate.

4. Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 16th day of September, 2017 in Menlo Park, California.

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DECLARATION ISO OTTO TRUCKING'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
CASE NO. 3:17-CV-00939-WHA